

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

In re VALEANT PHARMACEUTICALS
INTERNATIONAL, INC. SECURITIES
LITIGATION

**Master File No. 3:15-cv-07658
(MAS) (LHG)**

This Document Relates To:

No. 3:15-CV-07658 MAS-LHG

**STIPULATION AND [PROPOSED]
ORDER EXTENDING THE VAC
DEFENDANTS' TIME TO FILE
REPLY PAPERS**

This Stipulation is entered into between Lead Plaintiff TIAA (“Lead Plaintiff”) and Defendants ValueAct Capital Management L.P., VA Partners I, LLC, ValueAct Holdings, L.P., ValueAct Capital Master Fund, L.P., ValueAct Co-Invest Master Fund, L.P., and Jeffrey W. Ubben (collectively, the “VAC Defendants”).

WHEREAS, Lead Plaintiff filed a First Amended Consolidated Complaint (the “FAC”) on September 20, 2018;

WHEREAS, the VAC Defendants moved to dismiss the FAC on October 31, 2018,
setting a motion day of December 3, 2018;

WHEREAS, Lead Plaintiff filed a response in opposition on November 19, 2018;

WHEREAS, the VAC Defendants' deadline to file reply papers is currently November 26, 2018;

WHEREAS, given the intervening Thanksgiving holiday, the VAC Defendants request a one-week extension of their reply submission deadline to December 3, 2018, with a corresponding adjournment of the motion day; and

WHEREAS, Lead Plaintiff does not object to the VAC Defendants' request;

IT IS HEREBY STIPULATED AND AGREED by the undersigned that the motion day for the VAC Defendants' motion to dismiss the FAC is extended to December 10, 2018, and the VAC Defendants' time to file reply papers is extended to December 3, 2018.

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SO ORDERED, on this ____ day of _____, 2018.

Michael A. Shipp, U.S.D.J.